Securing Tennessee’s Future

Examining the Administrative Burden of the Tennessee Education Lottery Scholarship Program
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Foreword

For many years, there has been an assumption that there has been an undue administrative burden associated with the management of the lottery scholarship on the campus level. This report examines this issue through both quantitative and qualitative work and arrives at the conclusion that there is, indeed, a burden to campuses in facilitating the scholarships.

Campus financial aid officers feel the brunt of the work, but other offices and employees also play a role in the work needed to monitor the eligibility of recipients. Various factors associated with the scholarship make the administration of the award more burdensome to some campuses.

We hope that you will find this report informative. We would also like to thank Matthew Smith, a Vanderbilt University Public Policy graduate student, for the time he spent researching and writing about this issue.

Please let us know if you have any questions related to this project.
Executive Summary

In an effort to quantify the administrative burden to campuses through the management of the Tennessee Education Lottery Scholarship (TELS) program, the Tennessee Independent Colleges and Universities Association (TICUA) conducted research during the summer of 2009. Employees of TICUA member institutions responded to a survey allowing TICUA to determine the amount of work associated with the administrative tasks of various functional areas. The compiled responses estimate the number of hours spent on managing the scholarship program. In addition, respondents provided information concerning financial activity, new technology, and opportunity costs as a response to the management of the program.

A total of 67 survey responses were submitted, representing 29 institutions and 5 functional areas. Staff involved with financial aid submitted the largest number of responses. In addition, employees involved with information technology, enrollment management, institutional research, registrars, and financial areas responded. Three follow-up interviews elicited additional details about the management of the program. The three institutions interviewed differ on mission, enrollment size, and number of TELS students.

The data indicate there is a significant amount of work required to properly administer the TELS program. Monitoring continuing eligibility of scholarship recipients by the financial aid and registrar’s offices make up the bulk of the burden. A sizable opportunity cost is associated with the program since the employees working with the complex retention policies must make choices about where they focus their energies. This often means a loss for overall college retention strategies or time to develop innovative and entrepreneurial approaches. Looking at numbers alone, one cannot establish how many institutions have an administrative burden. However, institutions with large non-traditional populations, high TELS enrollments with respect to their total student body, and few automated data systems experience inordinate administrative burdens versus institutions with traditional age populations, low TELS enrollment ratios, and comprehensive software tracking systems. The increased burden not only requires more staff effort but also diverts attention from student services.

TICUA recommends the administrative burden of the scholarship be reduced through streamlining the qualification and retention standards of the program, most notably by relying on the institution’s own GPA rather than the lottery GPA and by resetting the benchmarks to reflect the institutional calendar rather than number of credits the student attempts.

The data support five policy recommendations. Four of the recommendations propose reforms that do not carry additional cost nor require broad changes in statute:

1. Use the institutional GPA as the main benchmark for TELS eligibility.
2. Set retention benchmarks to the end of an academic year.
3. Allocate an administrative allowance.
4. Create working group to address TELS concerns.
5. Provide technical assistance and program troubleshooting.
Tennessee Education Lottery Scholarship Program Overview

In 2004, the Tennessee General Assembly enacted the TELS program to award scholarships to Tennessee college students. The first students benefiting from this program were ones enrolling in college in the fall of 2004 as first-year and second-year students. This program reached maturity in the 2007-08 academic year with five cohorts of students participating in the program. The inaugural class of first-time freshmen began to graduate in 2008.

The State created the program to address several public policy objectives:
- Improving academic performance in high school through college scholarship incentives
- Providing financial assistance to students to promote college access
- Retaining the State's best and brightest high school students by creating an incentive for remaining in the State to attend college
- Enhancing and promoting economic and community development through workforce development

Initially, five distinct award types comprised the TELS program. Table 1 outlines for the academic year 2009-10 scholarship amounts and eligibility criteria for the four award types for which students at TICUA institutions are eligible. The initial legislation authorized an additional scholarship known as the Wilder-Naifeh Technical Skills Grant, which provides money to students studying at the State's technology centers.

The HOPE Scholarship is a broad-based award for students whose high school GPA is at least 3.0 or whose composite ACT score is at least 21. The Aspire Award is a need-based supplement to the HOPE Scholarship granted to students whose families earn less than $36,000/year. The General Assembly Merit Scholarship (GAMS) is a merit-based supplement to the HOPE Scholarship earned by students with at least a 3.75 high school GPA and a composite score of at least 29 on the ACT. The HOPE Access Grant provides a one-year scholarship to students from families earning less than $36,000/year with a high school GPA between 2.75 and 2.99 and a composite ACT score between 18 and 20.

Legislators modified an additional program for non-traditional students (aged 25 or older) during the 2008 legislative session. The modification enabled non-traditional students to become eligible for the lottery scholarship earlier in their academic career. Several additional awards, including the Dual Enrollment Grant, Foster Child Grant, and a graduate scholarship for teachers returning to be certified in math or science, are now part of the scholarship program. In 2008, the Legislature added scholarships for veterans of the War on Terror and the conflicts in Iraq and Afghanistan (Helping Heroes Grant) as well as rural health...
scholarships to increase the numbers of health service providers in underserved areas of the State. During the 2009 legislative session, lawmakers made minor changes in the lottery statute to clarify eligibility requirements, but did not make substantive changes to the program.

Individuals employed by colleges and universities in their financial aid offices are the campus employees who manage the bulk of the lottery scholarship tasks for college campuses. These financial aid employees alert students to the requirements of the award, determine initial eligibility for the award, communicate with the Tennessee Student Assistance Corporation (TSAC) through the e*GRandDs system to confirm a student’s participation in the program, and check grade point averages to determine a student’s continued eligibility for the program. Other functional areas on the campus involved in the management of the lottery scholarship are institutional research offices through the keeping of records about the lottery students; information technology offices through providing support with computer hardware or software solutions to ease the tasks of other offices; registrars offices through charting student GPAs, students services offices through work leading to assisting students in retaining the scholarship; and other enrollment management offices beyond financial aid, by assisting with sharing information with students about qualifying for and retaining the scholarship.

Campus staff members often suggest that the management of the lottery scholarship is burdensome, but there is little information, beyond anecdotes that support these statements. This report is a result of an investigation by the Tennessee Independent Colleges and Universities Association (TICUA) to determine the burden of the lottery scholarship program on independent colleges and universities. The conclusion is that there are certain areas where the burden on college officials can be lessened through both administrative changes and changes to the statute itself.
Table 1

2009-10 TELS Program Award Amounts and Eligibility Criteria

<table>
<thead>
<tr>
<th></th>
<th>Tennessee HOPE Scholarship (base award)</th>
<th>General Assembly Merit Scholarship (HOPE with merit supplement)</th>
<th>Aspire Award (HOPE with need-based supplement)</th>
<th>Access Award</th>
</tr>
</thead>
<tbody>
<tr>
<td>Award amount at 4-year institutions</td>
<td>$4,000</td>
<td>$5,000</td>
<td>$5,500</td>
<td>$2,750</td>
</tr>
<tr>
<td>Award amount at 2-year institutions</td>
<td>$2,000</td>
<td>$3,000</td>
<td>$3,500</td>
<td>$1,750</td>
</tr>
<tr>
<td>High School GPA</td>
<td>3.00</td>
<td>3.75</td>
<td>3.00</td>
<td>2.75</td>
</tr>
<tr>
<td>ACT Score</td>
<td>or 21</td>
<td>and 29</td>
<td>or 21</td>
<td>and 18-20</td>
</tr>
<tr>
<td>Family Adjusted Gross Income</td>
<td>n/a</td>
<td>n/a</td>
<td>$36,000 or less</td>
<td>$36,000 or less</td>
</tr>
</tbody>
</table>


Research Introduction

This paper documents information collected during the summer of 2009 from financial aid counselors and other staff at 29 Tennessee independent colleges and universities. The research explores whether TELS regulations posed an administrative burden on institutions and, in particular, financial aid offices. Responses to a survey and an interview instrument estimated the TELS administrative workload. The survey contained four thematic sections (Appendix 1). The first three sections aimed to quantify the actual administrative workload of the scholarship as objectively as possible. Responses estimated staff, work hours, and non-salary expenditures in various departments. Sixty-seven campus administrators completed surveys. This includes 21 financial aid officers, which represents 68% of TICUA campuses. In addition, 46 staff from enrollment, registrar, student accounts, information technology, and institutional research divisions responded. From the 21 survey respondents, three financial aid directors consented to interviews. The interview participants
represent each of the three geographic divisions of the State. One of the institutions has a large non-traditional TELS enrollment; of the other two institutions, one had a high scholarship enrollment level and the other a low enrollment level. Although the number of TELS recipients influences the ways institutions respond to TELS administrative workload, other variables—degree of collaboration between departments, size of the financial aid staff, and institutional reliance on TELS as a part of the student aid award—impact effort at independent institutions.

Three important phrases appear in this brief. In the survey and interview, the phrase *administrative workload* referred to the time, effort, and monetary resources expended by a department in order to comply with external or internal demands for information.

An *administrative burden* occurs when external demands for information cause institutions to devote more time and resources to the completion of administrative tasks versus another period in the past. Administrative burden develops when a scholarship is implemented, when new statutory requirements are added, or when the number of reporting requirements increases. Most of the data collected refer to an external burden imposed by statutory regulations. *Opportunity cost* defines the array of administrative priorities an institution could pursue if administrative workload was reduced.

Three questions aided in the development of the research instruments. First, do administrative reporting requirements affect how efforts are allocated in financial aid offices and other departments? Second, to what degree does the number of TELS recipients enrolled at the institution and the size of its financial aid staff affect its administrative workload? Third, which organizational structures make administrative reporting more burdensome to some TICUA institutions and less burdensome to others.
Data Results and Interview Feedback

Of the 31 baccalaureate institutions with TICUA membership in 2008-2009, 29 responded to the survey (94% response rate). Several offices at each institution, including financial aid, bursar, registrar, institutional research, and admissions/enrollment officers received requests to complete the survey. TICUA received a total of 67 survey responses. Over two-thirds of financial aid officers responded to the survey, representing almost one-third of the total submissions. Of these, 19 financial aid officers provided some information for staff, time, and monetary efforts (see table 2). Since the size of financial aid staffs vary, this brief calculates staff efforts three ways—staff hours per institution, staff persons per institution, and staff hours per person per week. None of the three metrics alone gives a holistic picture of administrative workload (or burden). The burden brought about by external and internal pressures vary widely across institutions, but the aggregate effort data show that administrative workload per staff member per week is quite similar across institutions, although it does increase as the institution’s enrollment increases.

Financial Aid Staff

The main part of the survey asked respondents to estimate the work frequency of 11 TELS-related administrative tasks. In order to reduce statistical variance, the survey did not ask respondents to rate the relative difficulty of TELS administration versus other aid programs. Further research may determine the relationship between TELS workload and total staff effort, but this paper estimates the workload inclusive to the TELS since the adoption of the provisional GPA and nontraditional entrance requirements added during the 2008 General Assembly. The 11 tasks ranged from the mundane (e.g., answering phones, advising students and university officials) to the highly technical (e.g., awarding aid, tracking GPA, collecting student unit record data). Two additional survey items asked respondents to estimate how frequently they thought about improving administrative efficiency and how they confronted the challenges of retaining students who lost TELS. Although several studies show that many students persist after the loss of scholarship aid, some institutions could spend more time finding other funding.

Each of the 21 financial aid respondents reported awarding aid on at least a monthly basis. In the case of improving administrative efficiency, more than two-thirds of respondents reported spending little time on this task. The two most difficult tasks, according to respondents, were GPA tracking and student data gathering. These
Table 2. Self-Reported Administrative Effort for Salaried Financial Aid Staff

<table>
<thead>
<tr>
<th>Institution</th>
<th>Enrollment Quartile(^1)</th>
<th>Salaried Employees</th>
<th>Hours/Week</th>
<th>Hours/Person/Week</th>
</tr>
</thead>
<tbody>
<tr>
<td>Institution A</td>
<td>1</td>
<td>1</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>Institution B</td>
<td>1</td>
<td>2</td>
<td>10</td>
<td>5</td>
</tr>
<tr>
<td>Institution C</td>
<td>1</td>
<td>3</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>Institution D</td>
<td>1</td>
<td>1</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td><strong>Total Quartile 1</strong></td>
<td><strong>INSTITUTIONS</strong></td>
<td><strong>1-2 Employees</strong></td>
<td><strong>5-10</strong></td>
<td><strong>5</strong></td>
</tr>
<tr>
<td>Institution E</td>
<td>2</td>
<td>4</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>Institution F</td>
<td>2</td>
<td>4</td>
<td>20</td>
<td>5</td>
</tr>
<tr>
<td>Institution G</td>
<td>2</td>
<td>6</td>
<td>30</td>
<td>5</td>
</tr>
<tr>
<td><strong>Total Quartile 2</strong></td>
<td><strong>INSTITUTIONS</strong></td>
<td><strong>4-6 Employees</strong></td>
<td>~25</td>
<td><strong>5</strong></td>
</tr>
<tr>
<td>Institution H</td>
<td>3</td>
<td>2</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>Institution I</td>
<td>3</td>
<td>2</td>
<td>16.75</td>
<td>8.375</td>
</tr>
<tr>
<td>Institution J</td>
<td>3</td>
<td>1</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>Institution K</td>
<td>3</td>
<td>2</td>
<td>35</td>
<td>17.5</td>
</tr>
<tr>
<td>Institution L</td>
<td>3</td>
<td>3</td>
<td>40</td>
<td>13.3</td>
</tr>
<tr>
<td>Institution M</td>
<td>3</td>
<td>4</td>
<td>45.83</td>
<td>11.475</td>
</tr>
<tr>
<td>Institution N</td>
<td>3</td>
<td>3</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td><strong>Total Quartile 3</strong></td>
<td><strong>INSTITUTIONS</strong></td>
<td><strong>1-4 Employees</strong></td>
<td><strong>15-45</strong></td>
<td><strong>8-18</strong></td>
</tr>
<tr>
<td>Institution O</td>
<td>4</td>
<td>5</td>
<td>90</td>
<td>18</td>
</tr>
<tr>
<td>Institution P</td>
<td>4</td>
<td>2</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>Institution Q</td>
<td>4</td>
<td>3</td>
<td>15</td>
<td>5</td>
</tr>
<tr>
<td>Institution R</td>
<td>4</td>
<td>2</td>
<td>7.25</td>
<td>3.625</td>
</tr>
<tr>
<td>Institution S</td>
<td>4</td>
<td>7</td>
<td>28.4</td>
<td>4.06</td>
</tr>
<tr>
<td><strong>Total Quartile 4</strong></td>
<td><strong>INSTITUTIONS</strong></td>
<td><strong>2-7 Employees</strong></td>
<td><strong>7-90</strong></td>
<td><strong>3-18</strong></td>
</tr>
</tbody>
</table>

\(^1\) For purposes of comparison, the table divides TICUA institutions into quartiles based on total undergraduate enrollment.

two tasks had the greatest variance in terms of how frequently they were completed. In terms of GPA tracking, 10 of the schools reported tracking GPA at least three times a month, while 9 reported checking on a monthly or semesterly basis. The split is similar for student data collection—11 collected at least three times monthly and 8 collected on a monthly or semesterly basis. Instead of a consistent administrative approach across campuses, it appears that the chosen administrative regime is in part attributable to the number of TELS enrollees at an institution. In fact, 6 of 10 financial aid programs tracking GPA and collecting student data on a monthly or semesterly basis had a below average number of TELS recipients.
When asked to rate how 2008 regulations affected students, 86% of financial aid respondents answered that the new rules positively benefited students. In terms of program administration, 43% of respondents answered that the new rule greatly increased workload, while 52% answered that the changes caused a small effort increase. Again, the perception of burden appears to be related to the frequency of tracking and the number of TELS students enrolled in the program.

Financial aid officers collaborated with admissions/enrollment officers and bursars most often; however, counselors felt that interactions with the registrar and information technology (IT) offices most reduced their administrative workload. Two institutions reported that the registrar and IT staff greatly reduced their workload. In both cases, survey comments showed that technology staff created or improved software for automated GPA tracking and data collection. When asked if peripheral offices reduced administrative workload, at least half of aid counselors thought that these offices did little or nothing to reduce workload. Auxiliary support from other offices could reduce workload somewhat, but using the expertise of registrars and IT professionals on an as-need basis seems to be preferred by many financial aid officers.

**Other Functional Groups**

Although this study’s primary purpose was to measure the effort used by financial aid officers in administering the lottery scholarship, the functional groups that work with financial aid counselors also submitted responses. The survey comments and data interpretations below illustrate the degree of collaboration between offices of financial aid and other departments. Several respondents commented on the need for increased departmental collaboration, which may indicate that institutions have begun to reform their administrative procedures in light of additional TELS reporting requirements. Table 3 summarizes the responses.

**Registrars**

- Fourteen registrars responded to the online survey.
- Registrars reported spending anywhere from 20 minutes to 9 hours per week on TELS-related tasks.
- Registrars referred students to financial aid counselors, transferred GPA data to financial aid databases, and answered routine TELS queries.
- Three registrars stated that the bulk of TELS effort is, and should be, assigned to the financial aid office.
- A registrar at an institution in west Tennessee wondered why TELS does not ‘use the university’s GPA
and attempted hours.” Later in the survey comments, she mentioned that following Satisfactory Academic Progress (SAP) guidelines of institutions “would reduce the confusion and frustration of the students and parents.”

• Another registrar reported that “allowing only one repeat [course] to improve the TELS GPA means that any automated [institutional] GPA calculation is null.”

• The registrar office at a college in east Tennessee “spent several hours…advising students on how to improve chances of retaining/regaining the TELS scholarship.”

• Registrars frequently discussed three themes: a) amendments to the TELS class repeat policy; b) replacement of the TELS GPA with an institutional GPA, thereby decreasing staff effort; and c) the level of involvement that registrars have with financial aid offices.

**Institutional Research (IR)**

• Thirteen institutional researchers responded to the online survey.

• Institutional researchers reported a staff effort figure of between 25 minutes and 4 hours per week on TELS-related tasks.

• Most IR offices have one or two employees working on TELS.

• Five IR staffs contribute 40-80 hours a year.

• Survey comments show that the majority of IR departments are only tangentially involved in TELS work. Two colleges—one in middle Tennessee and another in east Tennessee reported that tasks were completed by financial aid and business officers, the implication being that IR was used only in ‘time crunches.’

• A third school located in the mid-state reported that time spent on TELS increases yearly, especially as the college widens its institutional effectiveness audit of the financial aid department.

• At an institution in east Tennessee, the respondent said that his office “is responsible for all state/federal reporting…it would be a very welcome blessing to have reduced reporting requirements for TELS.”

• Another institutional researcher spoke to the same concept of opportunity cost: “reducing the time load would allow us to get to projects that are currently on the ‘wait list’.”

• Four institutional researchers perceived an increase in reporting workload. It appears that as the TELS reporting requirements increase, the workload is transferred to other departments. As of yet, only
institutions with larger TELS enrollments have experienced transfer of reporting burden. However, using the institutional GPA as the eligibility benchmark for TELS would ‘free up’ staff time, in order to conduct business tasks originally prescribed for researchers.

**Information Technology/Bursars/Enrollment Staffs**

- Nineteen staff in these departments responded to the survey.

- Two IT offices spend 10 and 24 hours a week on TELS activities, but these institutions have two of the highest ratios of TELS recipients to total enrollment among the independent colleges. The pressures on financial aid staff necessitated collaboration, because the current regime was unsustainable without some automation.

- IT staff provides three vital services: a) compiling financial aid data reports; b) performing roster certification queries; and c) creating or improving database software for automated financial aid tasks.

- Streamlining or simplifying reporting requirements could reduce time spent improving software and would eventually contribute to more time spent on student affairs and access concerns.

- Bursars and enrollment staff work very little on TELS tasks. Most bursars transmit aid to student accounts, while enrollment staff updates new applicant information to financial aid rolls.

- For one mid-state school, the enrollment staff plays a role in TELS administration by downloading prospect data from the e*GRaND system of the Tennessee Student Assistance Corporation (TSAC).

- A financial aid official at a west Tennessee school thought housing financial aid, enrollment, and registrar staff under one roof would facilitate role sharing. Most offices, however, consistently reported that administration of the scholarship was divided according to responsibility and that collaboration was limited.
Table 3. Summary of Survey Responses from Non-Financial Aid Departments

<table>
<thead>
<tr>
<th>Functional Group</th>
<th>Employees Working on TELS</th>
<th>Range of Hours/Week</th>
<th>Primary Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bursar</td>
<td>1-3</td>
<td>0-3</td>
<td>Transfer aid to Student Accounts</td>
</tr>
<tr>
<td>Enrollment/Admissions</td>
<td>2-8</td>
<td>1-5</td>
<td>Input applicant data into Financial Aid database</td>
</tr>
<tr>
<td>Information Technology</td>
<td>1-4</td>
<td>1-24</td>
<td>Automate Financial Aid infrastructure</td>
</tr>
<tr>
<td>Institutional Research</td>
<td>1-5</td>
<td>0.42-4</td>
<td>Compiling reports, interpreting data</td>
</tr>
<tr>
<td>Registrar</td>
<td>1-5</td>
<td>0.33-9</td>
<td>Collect GPA, student record data; transmit to Financial Aid</td>
</tr>
</tbody>
</table>

**Interviews**

Three institutions accepted an interview request. One is a medium-sized school (defined as total enrollment between 1,000-1,500 students) with a low ratio of TELS enrollees to the total student body. A second school also fits in the medium school size category, but over one-third of students are TELS enrollees. This institution is unique in that it is a denominational institution with a large non-traditional student population. The initial survey respondent from the third institution expressed a concern that the large TELS enrollment at her institution would further constrain her office’s ability to deliver vital student services. The interview allowed a more in depth study of this concern. The institution is large by TICUA’s standards (i.e., between 1,501 and 4,000 students) and has one of the largest percentages of TELS recipients as a ratio of total students. Follow-up interviews clarified and amplified survey comments. Selected institutions also submitted responses from three or more of the functional groups surveyed. These interviews offer unique perspectives and do not represent all TELS administrative experiences; they provide a range of institutional experiences that place current TELS administrative workload in a wider perspective.
Institution I: Medium-sized Institution, Low TELS Ratio

Two financial aid staff at Institution I were interviewed—the respondent to the survey and the financial aid director. Most of the hour-long interview focused on the institutional reactions to TELS regulations, including the provisional GPA and 24-credit hour checkpoints. The financial aid office works with the registrar and enrollment staff through the Banner software system. The registrar inputs semester-end GPAs and enrollment staff add applicant data into the software. These efforts do not reduce workload because they were tasks already assigned to those offices. Automating these procedures means that person-to-person contact/collaboration may actually decrease. The financial aid interviewees praised the progress TSAC has made in improving the e*GRandS system—an online portal which students, high school counselors, and university staff use to determine who is or may be eligible for the lottery scholarship. Institution I, however, has had trouble creating and improving their own GPA tracking software because new reporting requirements for provisional regains and course repeats are hard to program. Like Institutions K and M, these interviewees believe that if the State could clarify lottery scholarship transfer policies, it would reduce time spent on managing the scholarships for those students. Their office staff spent an inordinate amount of time figuring out which credits on the “transfer from” college transcript were included in the institutional and TELS GPAs. Determining whether classes were repeats, remedial courses, study abroad classes, and dual enrollment credits accounted for most of their effort in transfer checks.

The financial aid staff is small and has had only three salaried staff for the last fifteen years. Since 1994, the addition of the TELS program and the expansion of Title IV Federal Aid programs have increased financial aid workload, and there has not been a corresponding increase in staff hires. The interviewees reported the 2008 regulations were nuisances and did not rise to the level of an administrative burden. When asked why the regulations were not considered overly burdensome, the staff said that new requirements were added to the reports they already compiled. Since most freshmen recipients are traditional, residential students, they usually have progress checkpoints at the end of the first academic year. Students retaining TELS beyond the first year are sometimes checked at the fall midpoint, but these students are added to transfer and provisional student checks. When asked about how the State could become more involved, the interviewees felt that internal reform of procedures and increased automation would be the best prescription for lessening administrative workload.
Institution I has a below average TELS enrollment size as a percentage of the total student body. The small size of the program at this college may inform the ways that the financial aid staff views possible reforms. The financial aid counselors at this institution simply added the new reporting requirements to the list of tasks to be completed at the end of the semester. Institutions K and M found it harder to track their students because of the scale of their programs and the larger number of TELS students. For Institution I, the small number of students affects the perception of the administrative burden.

**Institution M: Large School, High Ratio of TELS Recipients**

Responses from Institution M were quite different from Institution I. The school has about three times as many TELS students as Institution I. When broken down by staff hours per person per week—a data point meant to standardize efforts across offices of different staff size—staff efforts are similar between Institutions I and M for salaried staff. However, the measurement is an average amount, so it does not show that one counselor works more than one-half of the total TELS staff hours in this office. Budget shortfalls have necessitated the cutting of one salaried and one hourly employee. It remains to be seen how the effort will be allocated in the future with this staff reduction. The IT staff has become more involved in the financial aid affairs, in order to address some of the internal pressures brought about by changes in the institutional budget. IT is working to identify students close to GPA benchmarks and in danger of losing the lottery scholarship. Although increased automation will lessen the administrative burden in the long run, efforts to develop automation will mean that financial aid resources will be further constrained in the short-term. Unlike some institutions, financial aid officers at Institution M conduct GPA tracking throughout the semester. This practice spreads the workload over sixteen weeks instead of the two weeks at the beginning and the two weeks at the end of the semester. Schools with large TELS recipient populations appear to prefer the weekly model of tracking and awarding, which may contribute to an added administrative burden by making scholarship management a daily or weekly objective. Institution I may perceive less of a burden because traditional students are tracked all at one time. Therefore, the administrative workload can be similar per year for two different organizational plans but the effect on the day-to-day administration can vary greatly. It appears that the number of students in a program, both in absolute terms and as a percentage of total student body, influences the timeline used. In fact, the weekly organizational method might be a response to the greater reporting burden for institutions with larger pools of TELS students. For instance, three or four financial aid officers could hardly dispense with their work objectives in eight weeks per year when their TELS enrollment is at least twice as large as the six institutions that follow a semesterly review process. Interviewees reported that calculating transfer student GPAs, tracking provisional TELS students, and the peculiarities of the school’s grade replacement policy added to their office’s administrative burden. Tracking provisional GPAs was considered the most difficult task.
Interviewees thought that IT was an important resource, because an automated institutional GPA would make it easier to calculate the TELS GPA manually. The financial aid officers felt that the registrar could provide more and better support to TELS efforts, which was a common sentiment in the survey. Perhaps, a clear delineation of responsibilities between the registrar and the financial aid office would reduce tension in institutions where the relationship is tenuous. The Informer software that Institution M uses will eventually track provisional students and look for regain opportunities. However, their interim assessment shows that these students will be only tracked; actual GPA calculation will continue to be a manual process. Interviewees would like to see the TELS award be more portable across Tennessee institutions. They found transfer GPAs problematic, because it is unclear which classes were counted toward the TELS GPA.

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Unlike Institution I, representatives from this college thought that a combination of regulatory and institutional changes would be the best way to eliminate the administrative burden. They thought that a middle ground should be established where provisional cases could be reviewed after every 24-credit hours, along with other TELS students. According to these employees, the regulations were somewhat invasive, but that the real administrative burden was the frequency of external reporting, not the actual reporting process.

**Institution K: Medium-sized Institution, Large Ratio of TELS Recipients**

Institution K has a large non-traditional TELS population. At this institution, two financial aid employees work a combined 35 hours per week on TELS related tasks. With fewer staff than the two other institutions interviewed, the administrative workload is slightly greater on a per staff basis. Further, gauging whether non-traditional students qualify after 12 credit hours of classes also poses an administrative burden not always felt by campuses with fewer students 25 years of age or older. Like the other two institutions, this college adds student record data into a software database. Unlike the other two, prospective TELS recipients’ GPAs and semester-end grade reports are not automatically added by enrollment officers and registrar staff. Incoming transfer students and non-traditional recipients represent more than half of the TELS population at this institution, which is not representative of most independent colleges in Tennessee. Staff in the financial aid office has a strong relationship with the registrar but a tenuous one with IT staff members. Most administrative tasks are done manually.

The interviewee spoke at great length about the benefits and drawbacks of using the institutional GPA for lottery scholarship eligibility. Since the purpose and mission of Tennessee independent institutions vary, the interviewee felt that using the institutional GPA would enable colleges to reduce staff
efforts on external reporting requirements. Institutions could reallocate staff effort
toward student services and financial aid priorities not receiving adequate attention. In
practice, using institutional GPA for scholarship eligibility would also eliminate
the burden brought about by the one-course repeat policy.

Using the institutional GPA would enable colleges to reduce staff efforts on external reporting requirements.

Using the institutional GPA for TELS eligibility would also reduce the administrative burden related to transfer students. The interviewee discussed a specific example of the impact of the transfer policy for TELS, because of miscommunication between the transfer school and his institution. The institution accepted a transfer application from a student, but did not know why the prior institution had approved an appeal when the student appeared to drop below 12 attempted credit hours. The interviewee expressed concern that he may miscalculate the new GPA for the transfer student because he does not know how the prior institution came to their ruling on the student’s scholarship eligibility. When TELS eligibility is contested it is unclear whose ruling is more legitimate—the old or new institution. If the institutional GPA determines the eligibility of the scholarship, this confusion would be eliminated since the institution’s own transfer grade policy would be used to determine the GPA and thus eligibility for the scholarship.

Both Institutions K and M were concerned with the THEC-TSAC merger, particularly with the potential for losing TSAC contacts. The Institution K interviewee thought that having local district reference people for technical assistance, organizational design, and general troubleshooting would relieve anxiety about losing TSAC contacts. Since the infrastructure exists for state district troubleshooters, the interviewee felt that the program could be enhanced without changing the program structure or altering the original intent of the program. Although the interviewee mentioned the possibility of an administrative cost allowance like those present in Title IV Federal Aid programs, he felt that his recommendation for district troubleshooters was more feasible since it would not require large statutory changes or an additional capital outlay from the state legislature.
Conclusions

Three conclusions can be drawn from the survey and interview responses:

First, the number of staff members devoted to TELS and the amount of staff effort expended to manage the lottery program on campus is roughly similar across institutions regardless of the campus’ TELS enrollment. Few respondents acknowledged hiring more staff since the 2008 regulations were passed. Their superiors had not recognized a need for increased staff, so administrative burden was created or enlarged at some institutions. Looking at numbers alone, one cannot establish how many institutions have an administrative burden. However, institutions with large nontraditional populations, high TELS enrollments with respect to their total student body, and few automated data systems experience inordinate administrative burdens.

Second, all three interviewed institutions and several survey respondents said that calculating a TELS GPA manually contributed significantly to their offices’ administrative workload. As outlined above, institutions with a higher ratio of TELS enrollees to the total student body have a larger administrative workload. Since burden is a perceptual measure, TICUA cannot independently confirm the extent of administrative burden for each institution. However, the increase in administrative workload since the 2008 adoption of the provisional regain and nontraditional student induction means that some institutions have a demonstrated administrative burden. Further research may define at which point work becomes burdensome. For this study, it is important to know that burden does exist for some institutions, even if the exact amount cannot be calculated at present.

Lastly, the data show that two main models exist for administering TELS—a weekly versus a semesterly basis. On balance, institutions with comparatively large TELS enrollments prefer the weekly model, whereas schools with lower TELS to student body ratios seem to use the semesterly model. The variance in models used affects the actual and perceived administrative burden. It is unclear whether an institutions use of one model or another is a response to

Institutions with large nontraditional populations, high TELS enrollments with respect to their total student body, and few automated data systems experience inordinate administrative burdens

Clarifying and minimizing the impact of TELS reporting requirements may reduce the administrative burden.
higher enrollment levels or to new regulations. The workload is more burdensome with the weekly check model because it is not confined to the beginning and end of each semester (eight weeks per year). Regardless of model, automation will minimize the burden over the long run. In the meantime, clarifying and minimizing the impact of TELS reporting requirements may reduce the administrative burden of some institutions and the administrative workload of all institutions.

Policy Recommendations

The data support five policy recommendations. Four of the recommendations propose reforms that do not carry additional cost nor require broad changes in statute:

1. *Use the institutional GPA as the main benchmark for TELS eligibility.*

Survey comments and interview feedback indicate that TELS reporting does not increase workload; the calculation of the TELS GPA does. In fact campus administrators overwhelmingly consider the determination of the TELS GPA the most burdensome part of the management of the scholarship program.

TICUA advocates using the institutional GPA for TELS eligibility. Relying on institutional GPA policies would eliminate the need to calculate a second GPA solely for use to determine lottery scholarship eligibility and thus eliminate much of the administrative burden associated with the program.

2. *Set retention benchmarks to the end of an academic year.*

Participating aid counselors recognize that checkpoints were created for a prototypical student taking 12 credit hours a semester for five years. Most TELS students at independent institutions take varying numbers of credit hours per semester, often more than 15 credit hours per semester. This means that students in the same graduation year may be assessed at different checkpoints. While automation can help identify students based on their TELS attempted hours, rechecking GPAs manually and notifying students of the conditions for retaining TELS is still necessitated.

By basing benchmarks on semesters completed rather than credits earned, an additional burden for institutions with above average enrollments can be reduced.

3. *Allocate administrative allowance.*

Complex aid programs on the federal level offer institutions a small administrative allowance to support the additional time and resources expended on the campus to administer the program. The lottery scholarship program as it now stands, creates significant work for campus administrators. A $5 per student administrative allowance, similar to federal Title IV programs, would provide institutions the ability to put money toward resources that best meet the campus’ need.
4. **Create working group to address TELS concerns.**

   Systemic reforms require broad consultation between different stakeholders. TICUA supports the creation of a working group, which would address ways to reduce administrative reporting requirements while retaining a high level of program accountability. TICUA envisions at least four stakeholder groups being included in the working group: legislators from the House Higher Education Subcommittee and Senate Education Committee; financial aid officers; community business leaders; public and independent higher education organizations (e.g., TICUA, THEC, TSAC, TASFAA).

5. **Provide technical assistance and program troubleshooting.**

   This recommendation arises out of interview and survey comments, in which staff discussed the need for accessible assistance, professional development, and program troubleshooting. Personnel in district offices could be responsible for a yet to be determined number of Tennessee institutions, public and private. Schools could request technical assistance or site visits, where a regional official could provide up to a week of troubleshooting assistance.
Appendix

PDF Snapshot of Survey Instrument

This snapshot of the survey instrument offers readers a representative of the tool used to collect the data reported in this paper. The data were collected on-line through the use of drop-down menu boxes and not all potential answers are represented in this snapshot. Any reader desiring more information about the instrument should contact TICUA.

**TELS Survey, 2008-2009 School Year**

The following survey asks several questions about the administration of the TELS program. This TELS survey is intended to collect information from all campus departments working on TELS projects. As such, the survey may contain questions that are not relevant to the work that you do.

The survey should take between ten and fifteen minutes to complete. Your full, forthright remarks are important to us, so we will, as in other TICUA surveys, not publish an institution's identifying information. If you have any questions about the TELS survey, please email Matthew Smith at smith@ticua.org. Thanks for your survey participation!

**Quantifying TELS Administrative Workload**

Please record how many salaried and non-salaried employees work on TELS administrative tasks and for how many hours per week, month, quarter, or year. Select the most appropriate time unit for your office from the dropdown menu.

Total Number of Salaried Staff

Total Salaried Staff Hours

Total Number of Hourly Staff

Total Hourly Staff Hours

**TELS Total Administrative Cost: Non-Personnel Expenditures**

Estimated Yearly Non-Personnel TELS Expenditure

Estimated One-Time Non-Personnel TELS Expenditure (e.g., equipment, software, or any non-recurring cost)
**Definition:**
Total TELS Administrative Cost refers to non-personnel expenditures. Examples of non-personnel expenditures include, but are not limited to the following: new equipment purchases, data software, events, meetings, trainings, student orientations, academic advisement, and financial aid literature.

**Administrative Tasks**

Please rate how frequently your institutional department works on the following TELS administrative tasks. If the particular task is not within the purview of your office, please select "N/A." Please add comments for each task, where relevant.

A. Tracking Lottery GPA

[Selection: Daily or Almost Daily (3 or more times per week)]

**Comments**

B. Awarding TELS (e.g. financial aid notifications & mailings, in-house administrative reporting, etc.)

[Selection: Daily or Almost Daily (3 or more times per week)]

**Comments**

C. Answering Phone Calls or Emails (for Lottery Eligibility, Retention, Rules Changes, etc.)

[Selection: Daily or Almost Daily (3 or more times per week)]
D. Gathering Academic and Unit Record Data for Administrative Reporting

- Daily or Almost Daily (3 or more times per week)

Comments

E. Advising TELS recipients directly on lottery requirements (e.g., orientations, workshops, academic advisement)

- Daily or Almost Daily (3 or more times per week)

Comments

F. Keeping University Officials Updated on TELS Requirements

- Daily or Almost Daily (3 or more times per week)
G. Reconciling TELS Financial Aid Rosters for TSAC

Daily or Almost Daily (3 or more times per week)

Comments

H. Transmitting Student Financial Aid (e.g., receiving funds from TSAC, transferring to Student Accounts, remitting excess to TSAC)

Daily or Almost Daily (3 or more times per week)

Comments

I. Finding Ways to Retain Students who Lost TELS

Daily or Almost Daily (3 or more times per week)
J. Developing Administrative Procedures and Instruments that May Reduce Staff Hours or Administrative Burden

Comments

K. Developing Ways to Publicize New Retention Rules to TELS Recipients

Comments

From the tasks above, please rank the three most difficult TELS administrative tasks to complete, taking into account the time, effort, and monetary resources required. Rank the task by selecting the corresponding letter and description from the drop down menu.

Most Difficult

Second Most Difficult
The rules for retaining TELS have recently changed. Now, students can retain the scholarship at the 48 credit hour benchmark with a 2.75 GPA, but must have a 3.0 GPA by 72 credit hours. Additionally, students with a 3.0 GPA in the semester they cross the 72 hour benchmark can retain the scholarship on a provisional, semester-by-semester basis. Please answer the following questions about the rules changes.

How does the rules change affect recipients?

How does the rules change affect administrative workload?

**Departmental Collaboration**

How frequently do you consult with people responsible for the following institutional functions? Please select "N/A" if you do not interact with the group or you are a member of the group listed.

**Institutional Research**

- Daily or Almost Daily (3 or more times per week)

**Registrar/Student Records**

- Daily or Almost Daily (3 or more times per week)

**Student Retention**

- Daily or Almost Daily (3 or more times per week)

**Enrollment/Admissions**

- Daily or Almost Daily (3 or more times per week)

**General University Finances/Student Accounts**

- Daily or Almost Daily (3 or more times per week)

**Faculty**

- Daily or Almost Daily (3 or more times per week)
Information Technology (IT)

Daily or Almost Daily (3 or more times per week)

Financial Aid

Daily or Almost Daily (3 or more times per week)

To what extent did interactions with these functional groups reduce administrative workload? Please select "N/A" if you do not interact with the group or you are a member of the group listed.

Institutional Research

To Little or No Extent

Registrar/Student Records

To Little or No Extent

Student Retention

To Little or No Extent

Enrollment/Admissions

To Little or No Extent

General University Finances/Student Accounts

To Little or No Extent

Faculty

To Little or No Extent

Information Technology (IT)

To Little or No Extent

Financial Aid

To Little or No Extent

**Free Response Questions**

How would your office allocate time and effort differently if the TELS administrative requirements were reduced?

Which issues does your institution consider when making retention decisions for students losing the TELS?
Which institutional or public policy reforms could you envision positively impacting your office's administration of TELS?

Additional Comments

Contact Information

Name

Position/Department

Institution

Phone

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